

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

CV-06

712

GLOBUS POMORSKA AGENCIJA D.O.O.,

Plaintiffs,

- against -

GLOBAL CONTAINER LINES LIMITED,

Defendant.

CLERK'S OFFICE  
DISTRICT COURT, E.D.N.Y.

FEB 17 2006

BROOKLYN OFFICE

COMPLAINT

DEARIE, J.

LAW 84.1

Plaintiff, by its attorneys, Cichanowicz Callan Keane Vengrow & Textor, LLP, for its complaint, alleges on information and belief:

1. The jurisdiction of this Court is based on 28 U.S.C. 1332(a)(2) in that:
  - (a) Plaintiff is a corporation organized and existing under the laws of Slovenia with an office and principal place of business in Koper, Slovenia.
  - (b) Defendant is a corporation organized and existing under the laws of one of the fifty U.S. states with an office and principal place of business in Garden City, NY.
  - (c) The amount in controversy exceeds \$75,000 exclusive of interest and costs.

2. Venue is based on 28 U.S.C. 1391(a, c) in that this is a diversity action and the defendant is corporation resident of and subject to personal jurisdiction in this district.

3. At defendant's request, plaintiff provided certain services for which it was to be compensated and incurred certain costs and expenses for which it was to be reimbursed.

4. The amounts due plaintiff for the aforesaid services, costs and expenses from defendant are itemized in the following four invoices rendered by plaintiff to defendant:

- |     |                         |                   |
|-----|-------------------------|-------------------|
| (a) | Invoice No. D/A 42/2004 | U.S.S 26,737.60   |
| (b) | Invoice No. 80002/04    | Euro € 74,982.00  |
| (c) | Invoice No. 80003/04    | Euro € 243,193.00 |
| (d) | Invoice No. 80004/04    | Euro € 37,795.58  |

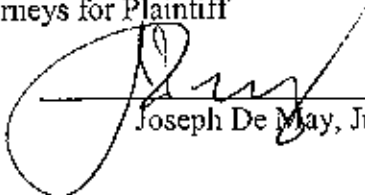
5. Defendant has paid no part of the foregoing although duly demanded. The amounts of the foregoing invoices are due and owing to plaintiff.

6. As of the date of this complaint, the rate of exchange is 1.00 EUR = 1.18962 USD.

WHEREFORE, plaintiff prays for judgment for the full amounts of its invoices together with interest plus the costs and disbursements of this action.

Dated: New York, NY CICHANOWICZ CALLAN KEANE VENGROW  
& TEXTOR, LLP  
61 Broadway, Ste. 3000, New York, NY 10006  
212-344-7042  
Attorneys for Plaintiff

By:

  
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Joseph De May, Jr. [JD-9105]